

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1**

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**In re:**

**PRINCETON AVENUE GROUP, INC.,**

**Debtor.**

**Case No.: 19-19841 (JNP)**

**Chapter 11**

**STIPULATION AND CONSENT ORDER RESOLVING DEBTOR'S MOTION TO  
COMPEL AND EXTENDING DISCOVERY DEADLINES**

The relief set forth on the following pages, numbered two (2) through three (3) is  
**ORDERED.**

Dated:

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Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Caption in Compliance with D.N.J. LBR 9004-1</b> Edmond M. George, Esquire Angela L. Mastrangelo, Esquire Obermayer Rebmann Maxwell & Hippel LLP 1120 Route 73, Suite 420 Mt. Laurel, NJ 08054 (856) 795-3300 <a href="mailto:edmond.george@obermayer.com">edmond.george@obermayer.com</a> <a href="mailto:angela.mastrangelo@obermayer.com">angela.mastrangelo@obermayer.com</a> <i>Attorneys for Arlene Pero and Jill Swersky</i>	
<b>In re:</b>  <b>PRINCETON AVENUE GROUP, INC.,</b>  <b>Debtor.</b>	<b>Case No.: 19-19841 (JNP)</b>  <b>Chapter 11</b>

**STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES**

Creditors Arlene Pero and Jill Swersky (the “Creditors”) and Debtor Princeton Avenue Group, Inc. (the “Debtor”), through their respective undersigned counsel, hereby file this Stipulation for Extension of Discovery Deadlines. The Creditors and the Debtor (collectively, the “Parties”) agree to extend the discovery deadlines set forth in the Scheduling Orders Relating to Objection to Claim No. 1 of Arlene Pero and Objection to Claim No. 2 filed in this case on February 27, 2020 (D.E. 65 & 66), by thirty (30) days, as set forth in further detail below.

The Parties have conferred regarding discovery and have come to an agreement regarding the procedure to be followed during discovery. The Parties believe at this time that an extension of thirty (30) days with regard to discovery deadlines would be in the best interests of the Parties. With a 30-day extension, the Parties agree that the discovery deadlines would be as follows:

1. All depositions shall be completed by **August 31, 2020**;
2. The discovery end date shall be **September 15, 2020**;
3. Dispositive motions, if any, shall be filed by **September 30, 2020**;

4. The evidentiary hearing on this matter will remain scheduled for **10:00 a.m. on October 22, 2020.**

Dated: July 30, 2020

Respectfully submitted,

Obermayer Rebmann Maxwell & Hippel LLP

McDowell Law, PC

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*Counsel for Princeton Avenue Group, Inc.*

**SO ORDERED BY THE COURT:**

Date:

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The Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Judge